

## EXHIBIT 2

**David A. Castleman**

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**From:** John Black <JBlack@dalyblack.com>  
**Sent:** Tuesday, May 23, 2023 4:08 PM  
**To:** Cameron Moxley; David Molton; Jeff Jonas; Michael Winograd  
**Subject:** Re: In re LTL Management LLC / Deposition Scheduling

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I assume this is all part of the same litigation – if so I don't see why he would sit twice. But I will discuss the matter with my client and revert back. Thanks.



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**From:** Moxley, D. Cameron <DMoxley@brownrudnick.com>  
**Date:** Tuesday, May 23, 2023 at 2:54 PM  
**To:** John Black <JBlack@dalyblack.com>, Molton, David J. <DMolton@brownrudnick.com>, Jonas, Jeffrey L. <JJonas@brownrudnick.com>, Winograd, Michael S <MWinograd@brownrudnick.com>  
**Subject:** RE: In re LTL Management LLC / Deposition Scheduling

Counsel:

We deposed Mr. Pulaski previously in connection with the PI. If he intends to be a witness at the trial on the motions to dismiss, we intend to proceed with a deposition. Please let us know if Mr. Pulaski intends to testify at the trial on the motions to dismiss.

We will direct communications to you going forward.

Thank you.

**brownrudnick**

**Cameron Moxley**

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He/him/his

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**From:** John Black <JBlack@dalyblack.com>

**Sent:** Tuesday, May 23, 2023 3:44 PM

**To:** Moxley, D. Cameron <DMoxley@brownrudnick.com>; Molton, David J. <DMolton@brownrudnick.com>; Jonas, Jeffrey L. <JJonas@brownrudnick.com>; Winograd, Michael S <MWinograd@brownrudnick.com>

**Subject:** In re LTL Management LLC / Deposition Scheduling

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Gentlemen:

I understand that you reached out to my client directly this past Sunday to request a second deposition.

As I stated on the record during Mr. Pulaski's deposition, please direct all such communications or requests to me. I believe I went so far as to provide my cell phone on the record during our last proceeding.

Mr. Pulaski is not going to appear a second time for deposition absent a court order. He sat for deposition once, and answered questions for the agreed upon period of time.

Thank you.



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